

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)	SUPERSEDING INDICTMENT NO.
)	4:22-CR-016
)	
)	18 U.S.C. 1349
)	Conspiracy to Commit Wire Fraud
v.)	
)	18 U.S.C 287
)	False, Fictitious, or Fraudulent
)	Claims
)	
SHAQUANDRA WOODS,)	18 U.S.C. 1001(a)(3)
COURTNEY GILCHRIST, and)	False Document
KENNETH JACKSON)	
)	18 U.S.C. 1001(a)(2)
)	False Statement

**RESPONSE TO GOVERNMENTS OPPOSITION TO DEFENDANT
WOODS OBJECTION TO ORDER AND MOTION TO RESCIND THE
ORDER AND ALLOW A HEARING ON MOTIONS PREVIOUSLY
REQUESTED**

1.

On April 20, 2023 the Status Report was filed in Shaquandra Woods case. Counsel for Shaquandra Woods had given all of his input for the Status Report filed on April 20, 2023. The deadline for having the Status Report filed was April 20, 2023. This deadline had passed and there was nothing further to be done with the Status Report. A substantial portion of the Government's response is based upon emails sent on April 21st, after the Status Report deadline of April 20th and after the original Status Report had been filed.

2.

Counsel left for a weekend of relaxation and to prepare for a show and performance he was hired to do on Saturday, April 22nd leaving early Friday, the 21st of April. He had no reason whatsoever to be monitoring his email for any activity regarding the Status Report in Shaquandra Woods' case as the Status Report had been filed on the deadline date of April 20th. Counsel's paralegal, Charlotte Raley, had taken a personal day and was out of the office. He did not see any of these emails from the 21st or the final Status Report that was filed on April 21st after the original Status Report, and after the Status Report deadline. This is supported by the lack of any response on the 21st.

3.

On the following Monday counsel had two jury trials scheduled that were resolved, along with appointments and meetings. Tuesday, counsel had a status conference, along with appointments and meetings. Wednesday is when the Order was filed granting the Government's Motion in Limine. On Wednesday, counsel had Court appearances, appointments and a meeting.

4.

When he received notice that the Status Report had been filed, he had no reason to believe it was any Status Report he had not reviewed and approved. When he noticed the emails from the 21st, upon returning to work, he

was in the process of formulating a response to what had occurred on the 21st, all without his input. While in the middle of formulating the response to the emails, he received the Order Granting the Government's Motion in Limine. Counsel then shifted to formulating a response to that Order.

5.

The rest and remainder of the Defendant's position has been adequately stated in the Objection To Order And Motion To Rescind Order And Allow Hearing On Motions As Previously Requested.

This 2nd day of May, 2023.

Respectfully submitted,

/s/ Jacque D. Hawk
Jacque D. Hawk
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)
VS.)
SHAQUANDRA WOODS) CASE NUMBER: 4:22-CR-0016
DEFENDANT)

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”) which was generated as a result of electronic filing.

Submitted this 2nd day of May, 2023.

By: s/ Jacque D. Hawk
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